

EXHIBIT UU

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF HILDA MAY VALENTINE

I, Hilda May Valentine, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of the attacks, I was working at Aon as a Supervisor/Case Manager on the 100th floor of the South Tower (WTC 2).

4. On the morning of September 11, 2001, I had arrived at work at 8 a.m. When the first airplane struck the North Tower, I was sitting at my office desk. Due to the impact of the airplane collision with the North Tower, the South Tower shook and the lights in my office began to flicker. From the window in my office area, I watched as paper and debris from the North Tower floated past my view.

5. While some of the officers on my floor dismissed the noise of the impact from the North Tower as probably a transformer exploding, I began to feel uneasy about my safety as I sat at my desk. I then made the decision as the manager that my unit and I should go downstairs to leave the building. A few members of my team immediately went downstairs. As I waited for the administrative assistant, Karen, to complete a phone call, I gathered some personal belongings. When Karen had completed her phone call, we immediately headed down the stairwell. As I quickly headed down the stairwell, an announcement could be heard in the building stating that the problem in the North Tower had not affected the South Tower. I decided to exit the stairwell at around the 70th floor, at which time I tried to call my sister, Sarah, as she worked at 33rd street in Manhattan. I could not reach my sister though as I could not maintain a cell phone signal.

6. At this point, I went back to the stairwell to continue my descent to the ground floor. About this time, the second airplane struck the South Tower. Smoke and debris began to fill the staircase. The force of the blast from the explosion threw me against the walls of the stairwell, causing me to suffer significant injuries to my head, neck, back, and left knee. I also suffered hearing damage from the incredibly loud sound of the explosion. I started to panic and my heart began to rapidly beat as I did not know what was happening inside of the building. At that time, a man grabbed my hand and he encouraged me to continue down the stairwell to the ground floor.

7. Despite my injuries, I traversed down the remaining steps in the stairwell (now completely filled with thick smoke and debris) in a desperate attempt to escape the South Tower. While moving down the stairwell in the haze of smoke, I inhaled large quantities of fumes, chemicals, and building debris into my nasal passages and lungs. Finally, I somehow managed to exit out of the South Tower.

8. Upon exiting the building, I encountered a war zone. I saw blood running down the street, and the area had become littered with dust and falling building debris. Brave police officers directed me to run from the area. As I fled the scene for safety, I heard the horrific sounds of the South Tower collapsing. I ran for the next few blocks away from Ground Zero, and then I somehow managed to walk to 33rd Street and 7th Avenue to where my sister worked. After my sister and I were reunited, we still had to walk to 114th street and 7th Avenue to where she had parked her car in order to get home. In making my escape from Ground Zero, I walked a total of seven miles with my injuries after having walked down over one hundred flights of stairs that day.

9. Tragically, I discovered after the events of 9/11 that Karen, the administrative assistant in my office, had not survived these horrible terrorist attacks. At the time of these events, Karen was only 23 years old and she reminded me of my daughter, who was of a similar age and had just started college a few weeks before 9/11. Karen's death was a tremendous loss and I felt a very heavy burden of responsibility for her death as her manager.

10. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: injuries to my cervical neck and lumbar areas which caused herniated discs at the C6-7, L3-4, L4-5, and L5-S1 levels (with nerve impingement at the L4-L5 level); torn meniscus in my left knee; a head injury (concussion) which caused long term memory loss and a neurocognitive disorder; an auditory processing disorder; gastro-esophageal disease; chronic rhinitis; a chronic cough; and a septal deviation with sleep apnea.

11. Further, due to my experiences on 9/11 as referenced above, I suffered, and continue to suffer, severe emotional distress and PTSD. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events.

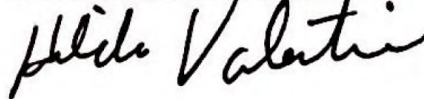
12. I sought medical treatment the day after these 9/11 terrorist attacks, and I continued to seek medical attention on a monthly basis for my injuries up to the present time. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatments that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

13. I previously pursued a claim (Claim Number VCF0070378) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29th day of October 2020.

Declarant, Hilda Valentine

A handwritten signature in black ink, appearing to read "Hilda Valentine", written in a cursive style.

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**